

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND,  
LTD., HAYMAN CAPITAL MANAGEMENT,  
L.P., AND CALIFORNIA STATE TEACHERS'  
RETIREMENT SYSTEM, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

- against -

UBS AG, UBS SECURITIES JAPAN CO. LTD.,  
MIZUHO BANK, LTD., THE BANK OF TOKYO-  
MITSUBISHI UFJ, LTD., THE SUMITOMO  
TRUST AND BANKING CO., LTD., THE  
NORINCHUKIN BANK, MITSUBISHI UFJ  
TRUST AND BANKING CORPORATION,  
SUMITOMO MITSUI BANKING  
CORPORATION, RESONA BANK, LTD., J.P.  
MORGAN CHASE & CO., JPMORGAN CHASE  
BANK, NATIONAL ASSOCIATION, J.P.  
MORGAN SECURITIES PLC, MIZUHO  
CORPORATE BANK, LTD., DEUTSCHE BANK  
AG, DB GROUP SERVICES UK LIMITED,  
MIZUHO TRUST AND BANKING CO., LTD.,  
THE SHOKO CHUKIN BANK, LTD., SHINKIN  
CENTRAL BANK, THE BANK OF YOKOHAMA,  
LTD., SOCIÉTÉ GÉNÉRALE SA, THE ROYAL  
BANK OF SCOTLAND GROUP PLC, THE  
ROYAL BANK OF SCOTLAND PLC, RBS  
SECURITIES JAPAN LIMITED, RBS  
SECURITIES INC., BARCLAYS BANK PLC,  
BARCLAYS PLC, BARCLAYS CAPITAL INC.,  
CITIBANK, NA, CITIGROUP, INC., CITIBANK,  
JAPAN LTD., CITIGROUP GLOBAL MARKETS  
JAPAN, INC., COÖPERATIEVE CENTRALE  
RAIFFEISEN-BOERENLEENBANK B.A., HSBC  
HOLDINGS PLC, HSBC BANK PLC, LLOYDS  
BANKING GROUP PLC, LLOYDS BANK PLC,  
ICAP PLC, ICAP EUROPE LIMITED, R.P.  
MARTIN HOLDINGS LIMITED, MARTIN  
BROKERS (UK) LTD., TULLETT PREBON PLC,  
BANK OF AMERICA CORPORATION, BANK  
OF AMERICA, N.A., MERRILL LYNCH  
INTERNATIONAL, AND JOHN DOES NOS. 1-50,

Defendants.

No. 15-cv-05844-GBD

**DECLARATION OF  
JOSEPH P. RANDAZZO  
IN SUPPORT OF  
DEUTSCHE BANK AG'S  
MOTION TO DISMISS  
FOR LACK OF  
PERSONAL JURISDICTION**

I, Joseph P. Randazzo, hereby declare:

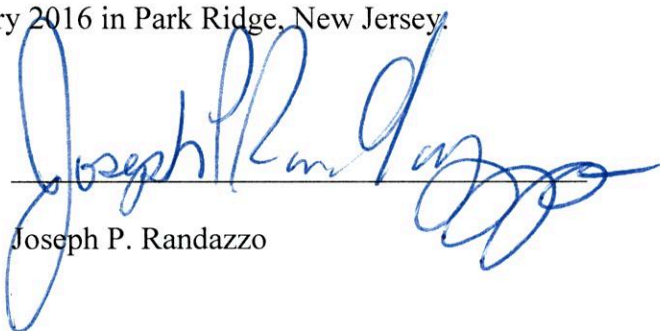
1. I am the former Global Head of Global Liquidity Management and a former employee of Deutsche Bank Securities Inc., a wholly owned subsidiary of Deutsche Bank Aktiengesellschaft ("Deutsche Bank AG"). I submit this declaration in support of Deutsche Bank AG's motion to dismiss the above-captioned action for lack of personal jurisdiction. The facts stated herein are true based on my own personal knowledge, obtained during the course of my employment, and inquiries I made within Deutsche Bank AG and my review of records maintained in the regular course of business by Deutsche Bank AG during this time.

2. At all relevant times, Deutsche Bank AG's Yen London Interbank Offered Rate ("LIBOR") submissions were not calculated or submitted in New York or the United States. No employees responsible for Deutsche Bank AG's Yen LIBOR submissions were located in New York or the United States.

3. At all relevant times, Deutsche Bank AG's Euroyen Tokyo Interbank Offered Rate ("TIBOR") submissions were not calculated or submitted in New York or the United States. No employees responsible for Deutsche Bank AG's Euroyen TIBOR submissions were located in New York or the United States.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28<sup>th</sup> day of January 2016 in Park Ridge, New Jersey.

  
Joseph P. Randazzo